# IN THE UNITED STATES BANKRUPTCY COURT OF JULY 11 FILES

AS BABARDETEY COURT CISTRICT OF DELAWARE

IN RE:

CHAPTER 11

W. R. GRACE & CO., et al.

CASE NO. 01-01139 (JJF)

Jointly Administered

Debtors.

## NOTICE OF APPEARANCE AND BANKRUPTCY RULE 2002 REQUEST FOR SERVICE OF NOTICES AND PLEADINGS

TO THE CLERK, THE DEBTORS, THE UNSECURED CREDITORS' COMMITTEE, THE U.S. TRUSTEE, AND ALL OTHER PARTIES-IN-INTEREST:

PLEASE TAKE NOTICE that Anne Marie P. Kelley, Esquire, of Dilworth Paxson LLP and Michael T. Kay, Esquire of The Dow Chemical Company hereby enter their appearance on behalf of The Dow Chemical Company, Hampshire Chemical Corp. and Union Carbide Corporation, creditors and parties-in-interest in the above bankruptcy cases, pursuant to Bankruptcy Rule 9010(b), and requests copies of all notices and pleadings filed in this case or proceedings therein, including notices provided pursuant to Bankruptcy Rule 2002(a), (b), and (f).

PLEASE TAKE FURTHER NOTICE that the foregoing request includes copies of all notices, motions, complaints, answers, applications and orders, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telefax, telecopy or otherwise with regard to the above case and proceedings therein. All such notices and pleadings should be sent to the following at the addresses listed below:

Anne Marie P. Kelley, Esquire Dilworth Paxson LLP LibertyView – Suite 700 457 Haddonfield Road Cherry Hill, New Jersey 08002 Telephone: (856) 663-8877

Fax: (856) 663-8855

Michael T. Kay, Esquire The Dow Chemical Company 2030 Dow Center Midland, Michigan 48674 Attention: Nancy Draves Telephone: (517) 636-1934

Fax: (517) 638-9393

PLEASE TAKE FURTHER NOTICE that neither this request nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive the following rights of The Dow Chemical Company, Hampshire Chemical Corp., or Union Carbide Corporation: (1) the right to have final orders in non-core matters entered only after de novo review by a district judge; (2) the right to a trial by jury in any proceedings so triable herein or in any case, controversy or proceeding relating hereto; (3) the right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (4) other rights, claims, actions, defenses, setoffs or recoupments to which The Dow Chemical Company, Hampshire Chemical Corp. or Union Carbide Corporation are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are

#### **DILWORTH PAXSON LLP**

Attorneys for The Dow Chemical Company, Hampshire Chemical Corp., and Union Carbide Corporation

**n** 

Dated: June 8, 2001

reserved.

Affile Walle 1. Refley

LibertyView – Suite 700 457 Haddonfield Road

Cherry Hill, New Jersey 08002

Telephone: (856) 663-8877

Fax: (856) 663-8855

Case 01-01139-AMC Doc 506 Filed 06/11/01 Page 3 of 15

## **CERTIFICATE OF SERVICE**

I hereby certify that I am a secretary employed by the law firm of Dilworth Passon LLP and that, on June 8, 2000, I caused a copy of the attached Notice of Appearance and Bankruptcy Rule 2002 Request for Service of Notices and Pleadings to be mailed to the individuals listed on the attached service list by regular first class mail.

I hereby certify that the foregoing statements made by me are true. I am aware that, if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By: <u>Valerie Minerd</u>

Valerie Minerd

The state of the s

TO JUNE 11 AND COLOR

Dated: June 8, 2001

#### Case 01-01139-AMC Doc 506 Filed 06/11/01 Page 4 of 15

#### The Dow Chemical Company

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

Laura Davis Jones, Esq.
David Carickoff, Esq.
Pachulski, Stang, Ziehl, Young & Jones
919 North Market Street, 16th Floor
P.O. Box 8705
Wilmington, DE 19899-8705
(Counsel to Debtors and Debtors in
Possession)

Hamid R. Rafatjoo, Esq.
Pachulski, Stang, Ziehl, Young & Jones
10100 Santa Monica Boulevard
Los Angeles, CA 90067-4100
(Counsel to Debtors and Debtors in
Possession)

Steven M. Yoder, Esq.
The Bayard Firm
222 Delaware Avenue, Suite 900
P.O. Box 25130
Wilmington, DE 19899
(Local Counsel to DIP Lender)

William P. Bowden, Esq.
Matthew G. Zaleski, III, Esq.
Ashby & Geddes
222 Delaware Avenue
P.O. Box 1150
Wilmington, DE 19899
(Local Counsel to Asbestos Claimants)

William H. Sudell, Jr., Esq. Eric D. Schwartz, Esq. Morris, Nichols, Arsht & Tunnell 1201 N. Market Street P.O. Box 1347 Wilmington, DE 19899 Derrick Tay, Esq.
Meighen Demers
Suite 1100, Box 11
Merrill Lynch Canada Tower
Sun Life Center, 200 Kint Street West
Toronto, Ontario M5H 3T4
CANADA
(Canadian counsel for Debtor)

David B. Seigel W.R. Grace and Co. 7500 Grace Drive Columbia, MD 21044 (W.R. Grace & Co.)

D.J. Baker, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, NY 10036
(Counsel to Sealed Air Corporation)

J. Douglas Bacon, Esq. Latham & Watkins Sears Tower, Suite 5800 Chicago, IL 60606 (Counsel to DIP Lender)

Mark D. Collins Richards, Layton & Finger, P.A. One Rodney Square P.O. Box 551 Wilmington, DE 19899 (Counsel for The Chase Manhattan Bank)

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

Jeffrey C. Wisler, Esq. Michelle McMahon, Esq. Connolly Bove Lodge & Hutz, LLP 1220 Market Street, 10th Floor Wilmington, DE 19899

Elihu Inselbuch, Esq. Rita Tobin, Esq. Caplin & Drysdale, Chartered 399 Park Avenue, 36th Floor New York, NY 10022 (Official Committee of Personal Injury Claimants)

Scott L. Baena, Esquire
Bilzin Sumberg Dunn Baena Price & Axelrod
LLP
First Union Financial Center
200 South Biscayne Blvd. Suite 2500
Miami, FL 33131
(Official Committee of Property Damage
Claimants)

James H.M. Sprayregen, Esq. James Kapp, III, Esq. Kirkland & Ellis 200 East Randolph Drive Chicago, IL 60601 (Counsel to Debtor)

Frank J. Perch, Esq.
Office of the United States Trustee
601 Walnut Street, Curtis Center
Suite 950 West
Philadelphia, PA 19106
(United States Trustee)

Francis A. Monaco, Jr. Esq. Walsh, Monzack and Monaco P.A. 1201 N. Orange Street, Suite 400\P.O. Box 2031 Wilmington, DE 19801 (Counsel for Ingersoll-Rand Fluid Products)

Lewis Kruger, Esq.
Stroock & Stroock & Lavan LLP
180 Maiden Lane
New York, NY 10038-4982
(Official Committee of Unsecured Creditors)

Todd Meyer, Esq. Kilpatrick Stockton 1100 Peachtree Street Atlanta, GA 30309

Nancy Worth Davis, Esq.
Ness, Motley, Loadhold, Richardson & Poole
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, SC 29465
(Counsel to Asbestos Claimants)

Securities & Exchange Commission 15th & Pennsylvania Ave. N.W. Washington, DC 20020

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

Delta Chemicals 2601 Cannery Ave. Baltimore, MD 21226-1595

Securities & Exchange Commission 15th & Pennsylvania Ave. N.W. Washington, DC 20020

Jon L. Heberling, Esq. McGarvey, Heberling, Sullivan & McGarvey PC 745 South Main Street Kalispel, MT 59901

Patrick L. Hughes, Esq. Haynes & Boone LLP 1000 Louisiana Street, Suite 4300 Houston, TX 77002-5012

District Director IRS 409 Siverside Road Wilmington, DE 19809

Securities & Exchange Commission Atlanta Regional Office Branch/Reorganization 3475 Lenox Road, NE, Suite 100 Atlanta, GA 30326-1232

James A. Sylvester, Esq. Intercat, Inc. 104 Union Avenue Manasquan, NJ 08736 Secretary of Treasurer P.O. Box 7040 Dover, DE 19903

Secretary of State Division of Corporations Franchise Tax P.O. Box 7040 Dover, DE 19903

James D. Freeman, Esq. U.S. Department of Justice Environmental Enforcement Section 999 18th Street Suite 945 – North Tower Denver, CO 80202

David S. Heller, Esq. Latham & Watkins Sears Tower, Suite 5800 Chicago, IL 60606

Charles E. Boulbol, Esq. 26 Broadway, 17th Floor New York, NY 10004

Ira S. Greene, Esquire Squadron, Ellenoff, Plesent & Sheinfeld, LLP 551 Fifth Avenue New York, NY 10176

Steven J. Johnson, Esquire Gibson, Dunn & Crutcher LLP 1530 Page Mill Road Palo Alto, CA 94304-1125

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

Charlotte Klenke, Esq. Schneider National, Inc. P.O. Box 2545 3101 S. Packerland Green Bay, WI 54306

Brad Rogers, Esq.
Office of the General Counsel
Pension Benefit Guaranty Corp.
1200 K. Street, N.W.
Washington, D.C. 20005-4026

Pamela Zilly Richard Shinder David Blechman Michael Alexander The Blackstone Group 345 Park Avenue New York, NY 10154

Bruce E. Jameson, Esq. Pricket, Jones & Elliott 1310 King Street P.O. Box 1328 Wilmington, DE 19899

Joseph Grey, Esq. Stevens & Lee 300 Delaware Avenue, Suite 800 Wilmington, DE 19801

Mary M. Maloney-Huss Wolf, Block, Schorr and Solis-Cohen LLP 920 King Street, Suite 300 One Rodney Square Wilmington, DE 19801 David S. Rosenbloom, Esq. Jeffrey E. Stone, Esq. Lewis S. Rosenbloom, Esq. McDermott, Weill & Emery 227 West Monroe Street Chicago, IL 60606-5096

Josiah Rotenberg Lazard Freres & Co. LLC 30 Rockefeller Plaza, 60th New York, NY 10020

Michael B. Joseph, Esq. Ferry & Joseph, P.A. 824 Market Street, Suite 904 P.O. Box 1351 Wilmington, DE 19899 (Counsel for Property Damage Claimants)

Mark S. Chehi Skadden, Arps, Slate, Meagher & Flom LLP One Rodney Square P.O. Box 636 Wilmington, DE 19899-0636

Michael R. Lastowski, Esq. Duane, Morris & Heckscher LLP 1100 North Market Street, Suite 1200 Wilmington, DE 19801-1246 (Counsel to Official Committee of Unsecured Creditors)

Stephen H. Case, Esq. Nancy L. Lazar, Esq. David D. Tawil, Esq. Davis Polk & Wardwell 450 Lexington Ave. New York, NY 10017

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

Jan M. Hayden William H. Patrick Heller, Draper, Hayden, Patrick & Horn, LLC 650 Poydras Street, Suite 2500 New Orleans, LA 70130-6103

Steven T. Baron, Esq. Silber Pearlman, LLP 2711 North Haskell Ave. 5th Floor Dallas TX 75204

W.J. Winterstein, Jr., Esq.
John J. Winter, Esq.
William M. Aukamp, Esq.
Eleven Penn Center, 29th Floor
1835 Market Street
Philadelphia, PA 19103
(Attorneys for PPG Industries, Inc.)

Alan R. Brayton, Esq. Brayton & Purcell 222 Rush Landing Road Novato, CA 94945

Russell W. Budd Alan B. Rich Baron & Budd, P.C. 3102 Oak Lawn Avenue, Suite 1100 Dallas, TX 75219

Courtney M. Labson, Esq. The Mills Corporation Legal Department 1300 Wilson Boulevard, Suite 400 Arlington, VA 22209 Joseph F. Rice Ness, Motley, Loadholt, Richardson & Poole 28 Bridgeside Blvd. P.O. Box 1792 Mt. Pleasant, SC 29465

Rosa Dominy Bankruptcy Administration IOS Capital, Inc. 1738 Bass Road P.O. Box 13708 Macon, GA 31208-3708

R. Scott Williams
PMB Capital Corp.
Four Falls Corporate Center
West Conshohocken, PA 19428-2961

Jonathan W. Young T. Kellan Grant Wildman, Harrold, Allen & Dixon 225 West Wacker Drive, Suite 3000 Chicago, IL 60606-1229

Shelby A. Jordan, Esq.
Nathaniel Peter Holzer, Esq.
Jordan, Hyden, Womble & Culbreth, P.C.
500 N. Shoreline Blvd. Suite 900
Corpus Christi, TX 78471

Cindy Schultz Ingersoll-Rand Fluid Products One Aro Center P.O. Box 151 Bryan, OH 43506

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

Alan Kolod, Esq. Moses & Singer LLP 1301 Avenue of the Americas 40th Floor New York, NY 10019-6076

John P. Dillman, Esq. Linebarger Heard Goggan Blair Graham Peña & Sampson, LLP P.O. Box 3065 Houston, TX 77253-3064

Paul M. Baisier, Esq. Seyfarth Shaw 1545 Peachtree Street Suite 700 Atlanta, GA 30309

Christopher Beard, Esq. Beard & Beard 306 N. Market Street Frederick, MD 21701

Steven R. Schlesinger, Esq. Jaspan Schlesinger Hoffman LLP 300 Garden City Plaza Garden City, NY 11530

Kimberly W. Osenbaugh Preston Gates & Ellis LLP 701-5th Avenue Suite 5000 Seattle, WA 98104-7078 Thomas Moskie Bankers Trust Company Four Albany Street Fourth Floor New York, NY 10006

Charles F. Gibson, III Attorney at Law 620 North Street, Suite 100 Jackson, MS 39202

Kevin D. McDonald Wilshire Scott & Dyer, P.C. One Houston Center 1221 McKinney, Suite 4550 Houston, TX 77010

Bernice Conn, Esq. Robins, Kaplan, Miller & Ciresi, LLP 2049 Century Park East, Suite 3700 Los Angeles, CA 90067

Steven J. Kherkher, Esq. Laurence G. Tien, Esq. Williams Bailey Law Firm, L.L.P. 8441 Gulf Freeway, Suite 600 Houston, TX 77017

Lewis T. LeClair, Esq. McKool Smith 300 Crescent Court, Suite 1500 Dallas, TX 75201

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

Steven T. Hoort, Esq. Ropes & Gray One International Place Boston, MA 02110-2624

Peter A. Chapman 24 Perdicaris Place Trenton, NJ 08618

Michael J. Urbis Jordan, Hyden, Womble & Culbreth, P.C. 2390 Central Blvd. Suite G Brownsville TX 78520

Margery N. Reed, Esq. Duane, Morris & Heckscher, LLP 4200 One Liberty Place Philadelphia PA 19103-7396

John M. Klamann Klamann & Hubbard 7101 College Blvd. Suite 120 Overland Park, KS 66210

Paul D. Henderson, Esq. Dies, Dies & Henderson 1009 W. Green Avenue Orange, TX 77630

Peter Van N. Lockwood, Esq. Julie W. Davis, Esq. Trevor W. Swett, III, Esq. Nathan D. Finch, Esq. Caplin & Drysdale, Chartered One Thomas Circle, N.W. Washington, DC 20005

Paul M. Matheny The Law Offices of Peter G. Angelos, P.C. 5905 Harford Rd. Baltimore, MD 21214

Mary A. Coventry Sealed Air Corporation Park 80 East Saddle Brook, NJ 07663

Meridee Moore Kirsten Lynch Farallon Capital Management, LLC Suite 1325 San Francisco, CA 94111

Joseph T. Kremer, Esq. Lipsiptz, Green, Fahringer, Roll, Salisbury & Cambria, LLP 42 Delaware Avenue, Suite 300 Buffalo, NY 14202

Robert Jacobs, Esq. Maria Rosoff Eskin Jacobs & Crumplar, P.A. 2 East 7th Street P.O. Box 1271 Wilmington, DE 19899

 $\mathbf{V}$ 

W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

Elizabeth S. Kardos, Esq. Gibbons, Del Deo, Dolan, Griffinger & Vecchione, PC One Riverfront Plaza Newark, NJ 07102-5497

Harry Lee, Esq. Steptoe & Johnson, LLP 1330 Connecticut Avenue, N.W. Washington, DC 20036

William S. Katchen, Esq.
Duane, Morris & Heckscher LLP
1 Riverfront Plaza, 2nd Floor
Newark, NJ 07102
(Counsel to Official Committee of Unsecured Creditors)

Damon J. Chargois, Esq. Foster & Sear, LLP 360 Place Office Park 1201 N. Watson Road, Suite 145 Arlington, TX 76006

Anton Volovsek Rt. 2 – Box 200 #42 Kamiah, ID 83536-9229

Jonathan H. Alden, Esq. Assistant General Counsel 3900 Commonwealth Blvd. MS 35 Tallahassee, FL 32399-3000 Thomas J. Noonan, Jr. c/o R&S Liquidation Company 5 Lyons Mall PMB #530 Basking Ridge, NJ 07920-1928

William E. Frese, Esq.
Sheree L. Kelly, Esq.
80 Park Plaza, T5D
P.O. Box 570
Newark, NJ 07101
(Counsel for Public Service Electric & Gas Company)

Paul G. Comers, Esq.
TN Attorney General's Office, Bankr. Unit
P.O. Box 20207
Nashville, TN 37202-0207
(Tennessee Department of Environment and
Conservation – Superfund)

C. Randall Bupp, Esq. Plastiras & Terrizzi 24 Professional Center Parkway Suite 150 San Rafael, CA 94903 (Counsel for Berry & Berry)

Peter S. Goodman, Esq. Andrews & Kurth LLP 805 Third Avenue New York, NY 10022

Credit Lyonnais 1301 Avenue of the Americas New York, NY 10019-0602

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

#### **SERVICE LIST**

State Library of Ohio c/o Michelle T. Sutter Revenue Recovery 101 E. Town Street, Second Floor Columbus, OH 43215

Greif Bros. Corp. 250 East Wilson Bridge Rd. Suite 175 Worthington, OH 43085-2323

Barbara M. Cook, County Solicitor Katherine L. Taylor, Senior Assistant County Solicitor Howard County Office of Law George Howard Building 3430 Courthouse Drive Ellicott City, MD 21043

M. Diane Jasinski, Esq.
Michael D. Hess
Corporation of Counsel of the City of New
York
100 Church Street, Room 6-127
New York, NY 10007

Russell W. Savory Gotten, Wilson & Savory, PLLC 200 Jefferson Avenue, Suite 900 Memphis, TN 38103

James P. Ruggeri Scott A. Shail Hogan and Harton, L.L.P. 555 Thirteenth Street, N.W. Washington, DC 20004-1109 Robert Jacobs, Esq. Jacobs & Crumplar, P.A. 2 East 7th Street P.O. Box 1271 Wilmington, DE 19899

Stephanie Nolan Deviney Brown & Connery, LLP 360 Haddon Avenue P.O. Box 539 Westmont, NJ 08108 (Counsel for SAP America, Inc.)

Danice Sims P.O. Box 66658 Baton Rouge, LA 70896

Janet Napolitano Robert R. Hall Russell W. Savory 1275 West Washington St. Phoenix, AZ 85007-1278

Credit Manager Belz Enterprises 100 Peabody Place, Suite 1400 Memphis, TN 38103

Steven R. Bourne, Esq. Nutter, McClennen & Fish, LLP One International Place Boston, MA 02119-2699 Case 01-01139-AMC Doc 506 Filed 06/11/01 Page 13 of 15

## The Dow Chemical Company

v. W.R. Grace 2002 Case No. 01-1139 (JJF)

## **SERVICE LIST**

Judy D. Thompson, Esq. S. Andrew Jurs, Esq. Poyner & Spruill, L.L.P. 100 North Tyron Street, Suite 4000 Charlotte, NC 28202-4010

Andrea L. Hazzard, Esq. Hughes, Hubbard & Reed LLP One Battery Park Plaza New York, NY 10004-1403 Daniel H. Slate, Esq. Hughes Hubbard & Reed LLP 350 South Grand Avenue Los Angeles, CA 90071-3442

## W.R. Grace List of Top Twenty Creditors

The Chase Manhatten Bank c/o Lawrence Palumbo 270 Park Avenue New York, NY 10017 (Top Twenty Creditor)

The Depository Trust Company c/o Ming Shaing, VP 55 Water Street New York, NY 10042 (Top Twenty Creditor)

The Depository Trust Company c/o Daniel Chipko P.O. Box 20 Bowling Green Station New York, NY 10274 (Top Twenty Creditor)

Robins Kaplin Miller Ciresi c/o Roman Siberfeld 2049 Century Park East #3700 Los Angeles, CA 90067 (Top Twenty Creditor)

Huntsman Corporation P.O. Box 65888 Charlotte, NC 28265 (Top Twenty Creditor)

Zhagras Environmental, Inc. c/o Susan Rice 46 West Broadway, Suite 130 Salt Lake City, UT 84101 (Top Twenty Creditor) PCS Nitrogen Gertilizer, L.P. c/o John Hill P.O. Box 71029 Chicago, IL 60694-1029 (Top Twenty Creditor)

Dupont Dow Elastomers c/o Rick Thomas 21088 Network Place Chicago, IL 60673-1210 (Top Twenty Creditor)

Cass Logistics Temporary c/o Ann-Margaret Bushnell 900 Chelmsford Street Lowell, MA 08510 (Top Twenty Creditor)

Union Carbide Corp. c/o Mia Skinner P.O. Box 91136 Chicago, IL 60693-0001 (Top Twenty Creditor)

Southern Ionics, Inc. c/o Milton Sunbeck Jr. P.O. Box 830800 Drawer 830 Birmingham, Al 35283-0800 (Top Twenty Creditor)

BASF c/o Diane Murdock P.O. Box 75908 Charlotte, NC 28275 (Top Twenty Creditor) DCP-Lohja Inc. c/o William McBain P.O. Box 2501 Carol Stream, IL 60132-2501 (Top Twenty Creditor)

Radian International c/o Mary Harris P.O. Box 844130 Dallas, TX 75284-4130 (Top Twenty Creditor)

Valeron Strength Films c/o Ron Luce 75 Remittance Dr., Suite 3068 Chicago, IL 60675 (Top Twenty Creditor) Risk, Co. c/o Lisa Clegg-Konen P.O. Box 7061 Downers Grove, IL 60515 (Top Twenty Creditor)

Stone Packaging System c/o Jim Wagner 21514 Network Place Chicago, IL 60673-1215 (Top Twenty Creditor)

Ingersoll-Rand Fluid Products c/o Eric Solverson P.O. Box 751229 Charlotte, NC 28275-1229 (Top Twenty Creditor)